

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

---

BERNADINE T. GRIFFITH	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 03-CV-12573-EFH
	)	
ONEBEACON INSURANCE COMPANY,	)	
ONEBEACON AMERICA INSURANCE	)	DEFENDANTS' MOTION TO
COMPANY, MICHAEL A. SISTO, and	)	ENLARGE PAGE LIMIT
KAREN ALLEN HOLMES	)	
	)	
Defendants.	)	
	)	

---

Pursuant to Local Rule 7.1(B)(4), the defendants OneBeacon Insurance Company, OneBeacon America Insurance Company (together, “OneBeacon”), Michael A. Sisto, and Karen Allen Holmes (collectively, the “defendants”) respectfully request this Court permit them to file a memorandum of law in support of their motion for summary judgment that is in excess of twenty double-spaced pages as set forth in Local Rules 7.1(B)(1). Specifically, the defendants request that they be permitted to file a memorandum of law that is not in excess of forty double-spaced pages.

As grounds for their motion, the defendants state as follows:

1. Plaintiff’s eleven count, thirty-seven page Amended Complaint against the four defendants includes claims for discrimination under the Americans with Disabilities Act, Title VII, and the Age Discrimination in Employment Act as

well as claims for harassment under each of the anti-discrimination statutes, to say nothing of Plaintiff's breach of contract claims.

2. The plaintiff incorporates two separate Charges filed at the Massachusetts Commission Against Discrimination in her Amended Complaint.
3. The factual background in this matter spans in excess of ten years and involves allegations of mistreatment during many portions of those ten plus years.
4. The parties have conducted nine depositions over the course of discovery in this case. Portions of many of these depositions are relevant to and will be addressed in the defendants' Motion for Summary Judgment.

The undersigned requested that counsel for the plaintiff state her position on the instant motion so that defendants could apprise the Court of it in this filing, but counsel for plaintiff has not responded. *See* Exhibit A, June 10, 2005 letter to Attorney Kathleen J. Hill.

WHEREFORE, the defendants respectfully request that they be granted leave to file a memorandum of law in support of their motion for summary judgment in excess of twenty pages but not to exceed forty pages.

Respectfully submitted,

ONEBEACON INSURANCE CO.,  
ONEBEACON AMERICA INSURANCE CO.,  
MICHAEL A. SISTO, and  
KAREN ALLEN HOLMES

By their attorneys

/s/ Leah M. Moore  
Keith B. Muntyan (BBO # 361380)  
keithmuntyan@morganbrown.com  
Leah M. Moore (BBO # 658217)  
lmoore@morganbrown.com  
MORGAN, BROWN & JOY, LLP  
200 State Street  
Boston, MA 02109  
617-523-6666 (phone)  
617-367-3629 (fax)

Dated: June 15, 2005

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I hereby certify that I attempted to confer with counsel for Plaintiff, Kathleen J. Hill, Esq. regarding the filing of this motion in compliance with Local Rule 7.1 of the Federal Rules of Civil Procedure.

/s/ Leah M. Moore  
Leah M. Moore

**CERTIFICATE OF SERVICE**

I, Leah M. Moore, hereby certify that on this 15<sup>th</sup> day of June 2005, I caused a true and correct copy of the foregoing to be served via first class mail upon Kathleen J. Hill, Esq., Attorney for Plaintiff, Law Office of Kathleen J. Hill, 92 State Street, Suite 700, Boston, Massachusetts 02109, being the address designated by said attorney for service of all pleadings.

/s/ Leah M. Moore  
Leah M. Moore